



STEIN | SAKS, PLLC

YAAKOV SAKS▲■*
JUDAH STEIN▲■
ELIYAHU BABAD▲■
MARK ROZENBERG ■
KENNETH WILLARD▲■

▲ NJBar Admissions
^ CT & NJ Bar Admissions
■ NY Bar Admission

*Federal Court Bar Admissions

AR, CT, CO, DC, IL, MI, MO, ND, NE, NM, TN, TX, WI

One University Plaza, Suite 620, Hackensack, NJ 07601 | tel: 201.282.6500 | fax: 201.282.6501 | www.steinsakslegal.com

June 1, 2023

Via CM/ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York

Re: Hanyzkiewicz v. The Hunt NYC LLC
Case #: 1:23-cv-03040-BMC

Dear Judge Cogan:

We represent the plaintiff in the above matter, and write in response to the Order to Show Cause of April 24, 2023, and to Defendant's May 30 motion to dismiss. We respectfully request leave to amend the complaint.

Plaintiff brings this class-action civil rights action pursuant to Title III of the Americans with Disabilities Act ("ADA"), 42 U.S.C. § 1281 et seq., alleging that the subject website, www.thehuntnyc.com, violates the ADA by not offering Plaintiff and all other blind and visually-impaired users access to its features.

We respectfully request leave to amend the complaint in light of *Calcano v. Swarovski N. Am. Ltd.*, 36 F.4th 68, 74 (2d Cir. 2022). It is Plaintiff's intent to plead with greater specificity as to Plaintiff's purpose for visiting Defendant's website, and the accessibility barriers that she encountered.

We ask for a period of 21 days to amend the complaint.

We thank Your Honor and the Court for its kind considerations and courtesies.

Respectfully submitted,

s/ Mark Rozenberg
Mark Rozenberg, Esq.